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Attorneys for Defendant
MICHAEL T. BLATT.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

LIBERTY MUTUAL INSURANCE
COMPANY,

Plaintiff,

v.

MICHAEL T. BLATT,

Defendant.

Case No. C06-2022 SC

**STIPULATED TO APPLICATION
TO ENLARGE THE TIME TO
OPPOSE AND REPLY TO THE
MOTION FOR SUMMARY
JUDGMENT, OR IN THE
ALTERNATIVE, FOR
SUMMARY ADJUDICATION OF
ISSUES**

Local Rules 6.1, 6.2, 7.12

Trial Date: November 19, 2007

Date: TBA
Time: TBA
Courtroom: 1, 17th floor

I, Ronald D. Foreman, declare that if called to testify in this matter that I would
testify as hereinafter stated:

1. I am the attorney for defendant Michael T. Blatt. This case concerns a claim
by plaintiff Liberty Mutual for declaratory relief seeking indemnity for attorney's fees paid
in an underlining state court action.

2. By this stipulated to application, the parties seek to enlarge the time for
defendant to oppose the pending Motion for Summary Judgment from Friday, October 5,

**STIPULATED TO APPLICATION TO ENLARGE THE TIME TO OPPOSE AND REPLY TO THE MOTION
FOR SUMMARY JUDGMENT, OR IN THE ALTERNATIVE, FOR SUMMARY ADJUDICATION OF
ISSUES**

1 2007 to Tuesday, October 9, 2007 and to enlarge the time for plaintiff to reply from Friday,
2 October 12, 2007 to Tuesday, October 16, 2007.

3 3. The motion is scheduled to be heard on October 26, 2007. Consequently,
4 if the Court grants the stipulated to application, the Court will have ten days to consider the
5 motion prior to the date of hearing.

6 4. Good cause exists for the granting of this stipulated to application. During the
7 week of September 17, 2007- September 21, 2007, counsel for plaintiff requested that the
8 Motion for Summary Judgment be served by email or fax. I agreed to that service.
9 Unfortunately, the email address used by plaintiff's counsel was obsolete and I was unaware
10 that the motion had been served until Wednesday, September 26, 2007. Although we have
11 diligently worked on the opposition, additional time is requested so that the matter might be
12 more fully briefed and prepared. The additional time requested will make up for the lost
13 days. Correspondingly, I have offered to enlarge the time for the plaintiff to reply.

14 5. Previously, the Court, on joint request and motion extended the time for the
15 final motion hearing date from October 12, 2007 to October 26, 2007.

16 6. All parties have notice of this application and have stipulated to it.

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ISSUES**

1 7. It is respectfully requested that this instant application be granted and that the
2 time to oppose and reply to the Motion for Summary Judgment be enlarged.

3 I declare, under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct.

5 Dated: October 3, 2007

FOREMAN & BRASS

By: 

Attorney for Defendant
MICHAEL T. BLATT

11
12 Dated: October 3, 2007

STIPULATED TO:

KRING & CHUNG, LLP

By: 

Ronald J. Skocypel
Attorney for Plaintiff
LIBERTY MUTUAL
INSURANCE COMPANY

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28 STIPULATED TO APPLICATION TO ENLARGE THE TIME TO OPPOSE AND REPLY TO THE MOTION
FOR SUMMARY JUDGMENT, OR IN THE ALTERNATIVE, FOR SUMMARY ADJUDICATION OF
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